

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**CHRISTOPHER CHAVEZ,**

**Plaintiff,**

**v.**

**No. 1:20-CV-00812 MIS/GJF**

**ABEL RENTERIA, JOHN DOE 1,  
CHRISTOPHER TURBOW, CARLOS SAENZ,  
DANIEL BLANCO, in his individual capacities,  
ESTEVAN FLORES, in his official capacity,  
NEW MEXICO CORRECTIONS  
DEPARTMENT,**

**Defendants.**

**JOINT MOTION TO DISMISS LAWSUIT WITH PREJUDICE  
PURSUANT TO SETTLEMENT AGREEMENT**

COMES NOW Plaintiff Christopher Chavez, by and through his counsel of record, Paul Linnenburger, and Defendants by and through counsel of record, Kennedy, Moulton & Wells, P.C. (Debra Moulton), and pursuant to a settlement agreement respectfully move this Court to dismiss with prejudice all of Plaintiff's claims against Defendants. Plaintiff and Defendants have compromised, resolved and settled their dispute without the admission of liability.

WHEREFORE, Plaintiff and Defendants respectfully move this Court to dismiss with prejudice all of Plaintiff's claims against Defendants including all claims that were or could have been included therein; and for such other and further relief as the Court deems just and proper.

Respectfully approved, agreed and stipulated to:

LANE LINNENBURGER LANE LLP

/s/ Paul Linnenburger

PAUL LINNENBURGER

Attorney for Plaintiff

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KENNEDY, MOULTON & WELLS, P.C.

/s/ Debra J. Moulton

DEBRA J. MOULTON

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